

Bremerton ❖ Kitsap County Health District

Scott W. Lindquist, MD, MPH, Director
109 Austin Drive
Bremerton, WA 98312

August 7, 2002

Ms. Silvia Kawabata
Environmental Protection Agency
Mail Stop-ECL115
1200 6th Avenue
Seattle, WA

206,553,1078

RE: GORST CREEK/BREMERTON AUTO WRECKING LANDFILL

Dear Ms. Kawabata:

The Bremerton-Kitsap County Health District respectfully requests the Environmental Protection Agencies' (EPAs) Superfund program consider the above referenced contaminated site located in Kitsap County for inclusion on the National Priorities List (NPL). This site is a landfill originally closed under Chapter 173-302 Washington Administrative Code (WAC). In late 2001 the Washington Department of Ecology ranked this site a "1", its highest priority site. In 1997 and again in 2002, excessive rains washed out landfill debris into Gorst Creek. Due to the recent degradation of site conditions and the potential release of hazardous substances into Gorst Creek, the Health District requests that EPA initiate clean-up action at Gorst Creek Landfill under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Background

This site is a closed landfill located on the south side of State Highway 3, west of Gorst in Kitsap County. This landfill operated as a privately owned disposal facility for use by the general public. This facility also contracted to accept solid waste (including industrial/chemical wastes) from the Puget Sound Naval Shipyard. This ravine-filled landfill overlays a drainage culvert, which carries upland stormwater run-off under the landfill, ultimately discharging to Gorst Creek. However, during periods of high rain, run-off collects behind and uphill from the landfill. In 1997 slide activity necessitated remedial action to shore up the landfill face and to reinforce the drainage system to protect State Hwy. 3. Interested parties and agencies included the Uhincks (previous owners), the Bremerton-Kistap County Health District, WA Fish and Wildlife Service, Department of Ecology (NWRO), and the WA Department of Transportation. Ecology issued Early Notice Letters under MTCA to the owners (Uhincks) and the Navy in December, 1997. The US Navy involvement in cooperative efforts began in May 1998 (see May 28, 1998 letter from Navy to TCP).

POULSBO ANNEX
Environmental Health Division
19540 Front Street

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Subsequent to remedial actions taken to repair storm damage at the landfill in 1998, the Navy undertook a site hazard assessment with the intent of pursuing either voluntary or independent remedial action at the site (see Site Hazard Assessment, Gorst Creek Landfill, October 13, 2000). The Navy concluded all cleanup activities at the site in early 2001 in response to Ecology's insistence that the MTCA residential clean-up standard be used at the site.

At the request of Ecology, the Health District proceeded with ranking Gorst Creek Landfill under MTCA. The Health District completed site ranking in late 2001, submitting the ranking package to Ecology recommending a site rank of 1. Ecology ranked this site a "1" in early 2002. The Health District is of the opinion that this site requires interim remedial action for the following reasons:

1. The site ranked 1 – Ecology's highest ranking;
2. The immediate threat posed by failing slopes and potential discharge of hazardous substances to Gorst Creek,
3. The threat to public health and safety should additional slope failure threaten Hwy. 3,
4. The magnitude of costs should a catastrophic failure occur that destroys Hwy. 3,
5. The lack of any viable party to take action at this site, and 6) the Navy's discontinuation of all clean-up activities at the site.

The Health District appreciates EPA's consideration of this request. Please notify the Health District of any assistance the Health District can provide in familiarizing your staff with the history of the site.

Sincerely,



Jan Brower

Solid and Hazardous Waste Program Manager

Enclosures: Ranking Package
Navy Letter (5/28/98)

Cc: ~~Steven A. [redacted]~~
Gretchen Olson, KCPW
Larry Tucker, Navy
Bill Nilles, Carina Trust
Scott Daniels, BKCHD
Jerry Deeter, BKCHD